

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA**

NAUTILUS INSURANCE COMPANY,

Plaintiff,

v.

RICHARD ALEXANDER MURDAUGH,  
SR., CORY FLEMING, MOSS & KUHN,  
P.A., CHAD WESTENDORF, and  
PALMETTO STATE BANK,

Defendants.

C/A No.: 2:22-cv-1307-RMG

**NAUTILUS INSURANCE COMPANY’S  
MOTION TO FILE EXHIBIT UNDER  
SEAL**

Nautilus Insurance Company (“Nautilus”) moves under the Court’s Confidentiality Order [ECF No. 97] and Local Rule 5.03 to file an exhibit to its Motion for Partial Summary Judgment (“the Motion”) under seal. **Exhibit 39** to the Motion is a two-page document produced by Defendant Palmetto State Bank (“PSB”) and designated “Confidential” in this matter. A placeholder exhibit<sup>1</sup> is being filed in connection with the Motion, and an unredacted version is being submitted directly to chambers for the Court’s review.

Prior to filing this motion, the undersigned consulted with counsel for PSB and for Defendant Westendorf to see if a less restrictive method could provide adequate protection. As no agreement has been reached, Nautilus (i) hereby moves to seal the Exhibit, (ii) will file a redacted version of the Exhibit on the public record, and (iii) will electronically send an unredacted version of the Exhibit to chambers for the Court’s review, with copy to all counsel.

**[signature on following page]**

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<sup>1</sup> **Ex. 1** hereto (Placeholder for Confidential Information to be Submitted to Court in Connection with Motion to Seal).

**Respectfully submitted:**

This 1st day of April, 2024  
Charleston, South Carolina

/s/ Jaan Rannik

EPTING & RANNIK, LLC

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*COUNSEL FOR NAUTILUS INSURANCE COMPANY*